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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ROBERT GEOFFREY DAVIS,  
Petitioner,  
vs.  
GABRIELA NAJERA, *et al.*,  
Respondents

Case No.: 2:23-cv-01208-APG-MDC

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO FILE  
ANSWER TO SECOND AMENDED  
PETITION (ECF NO. 22) (THIRD REQUEST)**

Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, hereby respectfully move this Court for an enlargement of fourteen (14) days of time, to and including August 22, 2025, in which to file and serve their answer to the second amended petition. ECF No. 22.

This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and other materials on file herein.

This motion is made in good faith and not for the purpose of delay.

RESPECTFULLY SUBMITTED this 8th day of August, 2025.

AARON D. FORD  
Attorney General

By: /s/ Leslie A. Healer  
LESLIE A. HEALER (Bar No. 16710)  
Deputy Attorney General

## **DECLARATION OF COUNSEL**

STATE OF NEVADA )  
CARSON CITY ) : ss.

I, LESLIE A. HEALER, hereby state, based on personal knowledge and/or information and belief, that the assertions of this declaration are true:

1. I am a Deputy Attorney General of the Post-Conviction Division of the Nevada Attorney General's Office, and I make this declaration on behalf of Respondents' motion for enlargement of time.

2. My answer to the second amended petition (ECF No. 22) in this matter is currently due on August 8, 2025.

3. By this motion, I am requesting a fourteen (14) day enlargement of time, to and including August 22, 2025, in which to file my answer. This is the third request for enlargement of time.

4. I require additional time to complete my answer in this matter.

5. I recently filed an answer in *Marshall v. Bean*, 2:23-cv-01394-APG-DJA, a reply in *Rodriguez v. Henley*, 3:24-cv-00182-MMD-CLB, and an answer in *Woods v. Royal*, 2:23-cv-00233-JAD-MDC.

6. Furthermore, I have the following pending reply in *Lemus v. Garrett*, 3:21-cv-00425-MMD-CLB. Additionally, I have several state responses due.

7. Despite actively working on the answer in this matter, based on the number of claims and several extensions in other cases, I need a small amount of time to complete the pleading.

8. I contacted counsel for the petitioner, and Ron Sung indicated that he has no objection to this request.

9. As such, this motion for enlargement of time is made in good faith and not for the purpose of unduly delaying the ultimate disposition of this case.

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1 Pursuant to 28 U.S.C. § 1746, Declarant herein certifies, under penalty of perjury, that the  
2 foregoing is true and correct.

3 Dated this 8th day of August, 2025.

4 By: /s/ Leslie A. Healer  
5 LESLIE A. HEALER (Bar No. 16710)  
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7 **ORDER**

8 IT IS SO ORDERED.

9 Dated this 8th day of August, 2025.

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11 ANDREW P. GORDON  
12 CHIEF UNITED STATES DISTRICT JUDGE  
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